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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DANIEL COHEN,

Plaintiff,

vs.

LOS ANGELES COUNTY, et al.,

Defendants.

Case No. 2:15-cv-3576-JAK (AGR)
Judge Hon. John A. Kronstadt
Magistrate Hon. Alicia G. Rosenberg

**JOINT AGENDA FOR
INDEPENDENT DISCOVERY
CONFERENCE**

Hon. Magistrate Judge Alicia R.
Rosenberg

1 Plaintiff Daniel Cohen and Defendants County of Los Angeles, Teresa
 2 Malone and Deputy Shah (collectively, the “parties”) jointly submit this agenda for
 3 the October 28, 2021 telephonic discovery conference with Magistrate Judge
 4 Rosenberg. The issues that the parties would like to address during the discovery
 5 conference are:

- 6 • The scheduling of the Rule 30(b)(6) deposition;
- 7 • A discussion of Defendants’ objections re certain of the Rule
 8 30(b)(6) topics, specifically Topic Nos. 18 – 23.
- 9 • A discussion of Defendants’ objections set forth in their
 10 responses to Plaintiff’s RFP [Set Three] specifically, RFP Nos.
 11 171-174, 200, 204-213, 215-216, 220, 238, 247-248, and 253-
 12 261.
- 13 • Copies of Plaintiff’s RFP [Set 3], Defendants’ RFP Responses
 14 [Set 3], Plaintiff’s Rule 30(b)(6) Notice and Defendants’
 15 Objections to Plaintiff’s Rule 30(b)(6) Notice will be submitted
 16 as Exhibits for the Court’s review.

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 18 DATED: October 27, 2021

ROBERT STANFORD BROWN, APC
THE LAW OFFICE OF JONATHAN
CORBETT

21
 22 /s/ Robert S. Brown

23 By: _____
 24 Robert S. Brown
 25 Jonathan Corbett
 26 Attorneys for Plaintiff DANIEL COHEN
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 28

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2 DATED: October 27, 2021

IVIE McNEILL WYATT PURCELL & DIGGS

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4
5 /s/ W. Keith Wyatt

6 By: _____

7 W. Keith Wyatt

8 Ade Jackson

9 Attorneys for Plaintiff COUNTY OF LOS
10 ANGELES, TERESA MALONE,
11 DEPUTY SHAH
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